

APPENDIX B
EXPLOSIVES SAFETY SUBMISSION FOR
INSTITUTIONAL/ENGINEERING CONTROLS
(EXAMPLE FORMAT)

B-1. Reason for Ordnance and Explosives.

Provide a brief description of why Ordnance and Explosives (OE) contamination exists in the specific area(s) of the site covered in the Explosives Safety Submission (ESS). This information may be derived from the following project documents: Inventory Project Report; Preliminary Assessment of Eligibility; Historical Records Searches; Archives Search Report; and/or Engineering Evaluation/Cost Analysis (EE/CA).

Provide a brief explanation that the site is under the Formerly Used Defense Site (FUDS) or Base Realignment and Closure (BRAC) program.

Provide a brief explanation that following an EE/CA or a risk assessment, the response action alternative of “Institutional/Engineering Controls” has been recommended. Include a description of the recommended institutional controls.

B-2. Maps.

a. Regional Map.

Provide a map showing the regional location of the site. For example, provide a state map with the site identified on it.

b. Site Map.

Provide a site map, which illustrates the OE area(s) addressed in the ESS. Show the current use of each area (for FUDS) or the expected reuse of each area (for BRAC). The specific boundaries of the area(s) should be clearly noted. If other areas of the site are not covered by the ESS, the reasoning for their exclusion should be explained. For example, these areas may be covered in a future ESS or were addressed by a previous ESS. If an area was covered in a previously approved ESS, then a copy of this ESS must be referenced in the new ESS and a copy of the approved ESS attached as an addendum to the new ESS.

Show the location of any areas, which will be addressed by institutional or engineering controls. For example, if deed restrictions are to be imposed, show the area affected. As another example, if an area will be fenced off, show the fence line.

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c. Soil Sampling Map.

If sampling of soils or groundwater occurred during the site investigation, provide a map outlining the area(s) sampled and the location and depth of the sampling points. Identify the field screening methods used and the concentrations of munitions constituents for each sampling point. Identify any environmental or legal considerations that are important to the implementation of institutional/engineering controls.

B-3. Justification.

Provide justification for institutional or engineering controls at the area(s) addressed in the ESS. This justification should include the following:

- a. The amounts and types of OE found during the site investigation. Present a brief synopsis of the results of the surface and intrusive investigations. This discussion should be supported by a table showing: the amount of OE; type of OE; and the depths of OE found in each area investigated.
- b. A summary of the risk analysis performed on the area(s) addressed in the ESS.
- c. A summary of the cost- benefit analysis, if performed.
- d. Provide a summary for the rationale for the selection of institutional or engineering controls as the most appropriate action, based on the amount, type, and depth of OE found; the risk analysis; and (if available) the cost-benefit analysis.
- e. If a Land Use Control Plan is available, provide it as an attachment to the ESS. If not available, describe each institutional or engineering control in detail. List the mechanism or agency where each control will reside (e.g., deed, local zoning board, building permit agency, local ordinance, etc). List who will monitor the effectiveness of the controls. List who will enforce the controls. List who will maintain any engineering controls (e.g., fences, signs). List any legal penalties, as applicable, for violation of any control. If public education is one of the selected controls, list who will be educated and how often and by what means. If fences and/or signs will be used, describe the type of fencing and the signage (content, spacing, size). If deed restrictions are used, include the restrictive language in substantially the same form, as it will appear in the deed, if possible.

B-4. Start Date.

Not applicable.

B-5. Migration of OE.

If the existing amounts, types, and depths of OE are expected to increase due to migration, describe what impact this will have on the level of risk at the site in the future. If the level of risk is expected to escalate back to an unacceptable level, describe what the plans are to address this escalation. Principle migration mechanisms are discussed below:

- a. Frostline. State the depth of the frostline at the site. Where OE is above the frostline but is currently deep enough to be an acceptable risk with the chosen controls, but may migrate upward and cause trouble in the future, describe what provisions will be made for continued surveillance of the area.
- b. If the area(s) encompass water bodies, then provide a discussion on the impact of wave action, tides, currents, storms, etc, on any potential OE migration.
- c. If the area lies in a watershed such that runoff and erosion can carry OE from upstream into the area, address this concern.

B-6. Clearance Techniques.

Not applicable.

B-7. Alternate Techniques.

Not applicable.

B-8. Quantity-Distance.

Not applicable.

B-9. Off-site Disposal.

Not applicable.

B-10. Technical Support.

Not applicable.

B-11. Public Involvement.

Discuss the public participation activities, which occurred as part of the EE/CA process, including:

- Public meeting(s);
- Restoration Advisory Board, if applicable;
- 30-day public comment period;
- Press conference(s);

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- Media day(s); and
- Location of the Administrative Record.

B-12. After Action Report.

An After Action Report will not be produced. A FUDS Completion Memorandum or Statement of Clearance will be executed to close out the project.

B-13. Recurring Reviews.

Include a description of the Recurring Review Plan.

B-14. Summary.

Present a summation of the project, which mirrors the language in the conclusion of the EE/CA.

Shall state that "A FUDS Completion Memorandum or Statement of Clearance will be placed in the Information Repository and may be placed in the Administrative Record."